

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE SEPTEMBER 11 LITIGATION

21 MC 101 (AKH)
This document relates to :
Bavis v. United Airlines Inc.
et al., 02 Civ. 7154;
World Trade Center
Properties LLC, et al. v.
United Airlines, Inc. et al.,
08 Civ. 3719; and
World Trade Center
Properties, LLC et al. v.
American Airlines, Inc., et
al., 08 Civ. 3722

DECLARATION OF JON PAUL ROBBINS

JON PAUL ROBBINS hereby declares as follows:

1. I submit this declaration, pursuant to 28 U.S.C. §1746, in support of the motion of ICTS International, N.V. ("ICTS") for summary judgment dismissing the remaining actions that are pending against it.
2. I am an attorney admitted to practice before this Court, and I am member of McLaughlin & Stern, LLP, attorneys for ICTS in these actions.
3. I attach as Exhibit 1 a copy of the Second Amended Complaint filed by plaintiff Mary Bavis under Case Number 02 Civ. 7154.
4. I attach as Exhibit 2 a copy of the Fourth Amended Flight 175 Master Liability Complaint filed in this action, which encompasses the claims alleged by Mary Bavis.
5. I attach as Exhibit 3 a copy of ICTS' Answer to the Fourth Amended Flight 175 Master Liability Complaint.

6. I attach as Exhibit 4 a copy of the Complaint filed by the WTCP plaintiffs under Case Number 08 Civ. 3719.

7. I attach as Exhibit 5 a copy of ICTS' Answer to the Complaint in Case Number 08 Civ. 3719.


8. I attach as Exhibit 6 a copy of the Complaint filed by the WTCP plaintiffs under Case Number 08 Civ. 3722.

9. I attach as Exhibit 7 a copy of ICTS' Answer to the complaint in Case Number 08 Civ. 3722.

10. I attach as Exhibit 8 a copy of Mary Sciavo's letter to the Court dated March 11, 2011, with the Court's endorsement.

11. I declare under penalties of perjury that the foregoing is true and correct.

Dated: May 3, 2011



Jon Paul Robbins